

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT Knoxville

AUG 15 2022

Clerk, U. S. District Court
Eastern District of Tennessee
At Knoxville

Mr. Adrian Kenton Madin Jr.,)

Tdoc #547334 .)

Pro 'se - Plaintiff)

(Enter above the NAME of the
plaintiff in this action.)

v. Warden)

Mr. Mike parries understaff)

Stacey nakes 3 STEVE jones)

c/o ms. Kaylyn Coffey et al.)

(Enter above the NAME of each
defendant in this action.))

Civil Suit + Complaint

Case No. 3:22-MC-00029-
KAC-jem

8th Amendment Use. of. force
abuse. Under. Cdt. of. state.
Law. Violation(s) et al.

3:22-cv-282

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(42 U.S.C. Section 1983)

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? YES () NO (✓)

B. If your answer to A is YES, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to the previous lawsuit:

Plaintiffs: _____

Defendants: _____

2

2. COURT (If federal court, name the district; if state court, name the county): _____

3. DOCKET NUMBER: _____

4. Name of Judge to whom case was assigned: _____

5. Disposition: (For example: Was the case dismissed? Was it appealed? Is it still pending?) _____

6. Approximate date of filing lawsuit: _____

7. Approximate date of disposition: _____

II. PLACE OF PRESENT CONFINEMENT: Marang County / M.C.C.X

A. Is there a prisoner grievance procedure in this institution? YES (✓) NO ()

B. Did you present the facts relating to your complaint in the prisoner grievance procedure? YES (✓) NO ()

C. If your answer is YES,

1. What steps did you take? on 9/30th/2021 i file [an]

Inmate grievance against My use of force abuse .

2. What was the result? The grievance chair person Staff
Spl. j. Byrge ; Never answer (not once) .

D. If your answer to B is NO, explain why not. _____

E. If there is no prison grievance procedure in the institution, did you complain to the prison authorities? YES (✓) NO ()

F. If your answer is YES,

1. What steps did you take? i Contact Warden: Mike Dennis

under inmate request form sheet He Never Answer .

2 .

2. What was the result? Warden: Mike Parris Violated my First Amendment by Freedom of Speech;

III. PARTIES

(In item A below, please your name in the first blank and place your present address in the second blank. Do the same for any additional plaintiffs.)

A. Name of plaintiff: Mr. Adrian Kenton. madin JR.
Present address: M.C.C. X 541 Wayne Cotton morgan Drive WarTburg T 37887
Permanent home address: 2925 Wingate Street Memphis TN 38127-828
Address of nearest relative: 3398 Covington Pike, Memphis TN 38128.

(In item B below, place the FULL NAME of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the additional names, positions, and places of employment of any additional defendants.)

B. Defendant: Mr. Mike Parris / Supervisory Liability
Official position: M.C.C. X Head Warden.
Place of employment: Morgan County Correctional Complex

C. Additional defendants: C/o s Kaylyn Coffey, Derrick daughter
A.T.W. Steve jones, + Stacy oakes etal.

IV. STATEMENT OF CLAIM → 8th Amendment use of force abuse
Under color of state LAW violation(s).

(State here as briefly as possible the FACTS of your case. Describe how EACH defendant is involved. Include also the names of other persons involved, dates and places. DO NOT give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets, if necessary.)

Thus Come(s) pro se - plaintiff: Mr. Adrian Kenton JR.
This is a civil action authorized by 42 U.S.C at

3.

IV. Statement of Claim 4 of 18.

Section 1983 To redress the deprivation, under color of STATE law, of rights secured by the Constitution of The United STATES.

This Court has jurisdiction under 28 U.S.C. at section 13313 (1343(a)(3)). Plaintiff seeks declaratory relief pursuant to 28 U.S.C. section 2283 (2284) Rule 65 of The federal Rules of Civil Procedure.

This U.S. District Court of knoxville, Tennessee is appropriate venue under 28 U.S.C. Section at 1391.(b) (2) because it is where the events giving rise to this claim occurred.

Thus on September 29, 2021 coms. Kaylyn Coffey said defendant did unlawfully violated the Tennessee Law at T.C.A. § 41-1-103 atth of office as she opened "a" maximum security door without first placing hand cuff(s) on Plaintiff: Mr. Adrian Kentron. madin JR.

This Viconnet Video System at unit 23-B pod at Cell # 208 will be use as (Exhibit #1).

(3) Subpoena were the above defendant coms. Coffey was proceeding to assault the held above plaintiff as she did force her finger(s) in his facial area;



IV. Statement of Claim 5 of 18.

As Plaintiff Made His attempt To Smack the defendant: C/o. Coffey's hands away from his face She The above defendant pressed Her Said emergency panic button To get Help from Several un'known officers which arrived in The Unit 23 - B pod indoor area including Said Defendant: Derrick Daughtry, at This time Plaintiff Was pepper sprayed in His Mouth eye(s), ear(s), nose, area(s) of jump'd on By assault(s) from Derrick Daughtry or other un'know official officer(s) as They all 'Slam'd Plaintiff To floor & forcefully Place handcuff(s) on Him as all Defendant(s) are on (Exhibit #1) The Yiconnet Video System Seen Taking Plaintiff To The institutions intake gallery & place Him in Cell by The unknown amount(s) of officers including Defendant: Derrick Daughtry, Were Aver To Subpoena (Exhibit #2) Which is The held "institutions intake gallery area", on arrival in This holding cell plaintiff was force To face The wall But He was unable To See Because His Vision Black'ed out from The pepper-spray as His Handcuffs were being removed Plaintiff Heard "an" officer(s) Voice Say "Go", & He Was Being Assaulted by ATTACK of Hit(s) Made By punch(s) With Close fist along with Being Kicked Several time(s) in The Body ->

IV. Statement of Claim 6 of 18.

3 The Back of His Head area(s) were Several Minutes Had passed before This Beating have been Stopped.

Were Plaintiff: Mr. Adrian Kenton Madin Jr., Heard one un'known officer Speaking 3 say Let(s) go fellas, He(s) not fighting back He's demoralized, He's a bitch. This was Said out loud Several time(s) doing This false attack The above plaintiff Cryed out in anguish To Stop.

as Several hours Had passed Were The above Plaintiff was approached by Said defendant(s): Derrick Daughtry 3 justin moore as The Both proceeded To Take Several photo(s) of Plaintiff(s) Body injure's were defendant(s) order Him To Turn at different angles as again without Warring defendant: justin moore Hit Plaintiff Twice with [an.] close fist 3 daughter with The help of Two other un'known officers Took Plaintiff To The ground 3 They all state'd To barrage of kick(s) To His entire body 3 Plaintiff was Then put Back into Handcuff(s) a second time.

Thus plaintiff would like To use (Exhibit #3) By Subpoena at time apxx: 11:30 aM hour(s) of "institutions intake gallery holding cell room area". of This 3rd Beating was never giving any kind of relief from The Receiving of medical attention as during beginning of This incident. →

IV. Statement of claim 7 CP 18.

Therefore Defendant(s), Warden Mr. Mike Parrish, Head Warden, & Under Staff Warden(s) Steve Jones, & Stacy Cakes, which are all Held To Be under Supervisory Liability Because under The body of Tennessee LAW at T.C.A. § 41-1-104 at (b) The custody, welfare, conduct & safekeeping of the inmates shall be the responsibility of The Warden, who will examine into the affairs of the institution daily to assure that proper standards are maintained.

This was deprived by deprivation under color of State LAW as all Under Staff defendant(s) Has Clause Violation(s) within T.C.A. § 41-1-b3 at area (A) all officers and other persons so employed to control & manage the penitentiary for the state shall, before entering upon the discharge of their duties, take & subscribe the following oath.

Plaintiff Aver(s) / Defendant(s) C/o Ms. Kaylyn Coffey & C/o Mr. Derrick Daughtry + unknown official Correctional Officer(s) unlawfully acted against (C) The violation of this oath by any of the officers "or" employees shall be perjury punishable as in other cases of perjury.

Here plaintiff aver that all Warden(s) Name'd above are held responsible under area at (b) The oath of the assistant or deputy Commissioner / Wardens & Superintendents shall be filed with the

IV. Statement of claim 8 of 18.

Secretary of State, The oaths of all other employees shall be filed with The Commissioner of Correction.

Therefore Pro'se- plaintiff: Mr. Adrian Kenton. Madin JR HAS STATE a claim for relief being That The Warden(s) are responsibility for none proper Training of There underStaff(s) Defendant(s), during Physical altercations Thus failed To properly guide officer(s) in Their duties By Official public Tennessee.department. of.

Corrections(s) M.C.C.X Penitentiary officer(s) HAS Cause [Eighth Amendment(s) Violation(s)] done By The use of unlawfu force Which HA open relief under Section 1979 of The Revised Statutes of The united States [42 U.S.C. 1983] is amended by adding at The end The following, → it Shall not be a defense "or" immunity in any action brought under This section against a local law enforcement officer (as such term is defined in Section 2 of The George Floyd justice in Policing act of 2021.) There fore Plaintiff: Mr. Adrian Kenton. Madin JR., Aver Defendant: Tony Parker, former TDOC Commissioner is held Under responsibility Due because of Supervisory Liability Because His understaf Member(s) HAS deprived T.C.A § 41-1-103 Thru The Violation(s) made against T.C.A § 41-1-104 at Warden, powers 3 duties error(s) of State Law Both

IV. Statement of Claim 9 of 18.

area(s) (A) & (B) Pin point(s)

Under The Said direction & control of The Commissioner of Correction.

Which open(s) Tennessee State Law under T.C.A. § 4-3-606 Powers & duties. Were the department of Correction Shall exercise all the rights, powers & duties described in chapter 6 of this title & otherwise vested by law in the department, the Commissioner, & the Commissioner officers, assistants & employee(s). Therefore in order

To state a claim must allege that the supervisors were somehow personally involved in the said unconstitutional personally activity as the defendant: Tony Parker, is said by law is required under the grand(s) of official-capacity action. . . . Because

a governmental entity to be liable under § 1983 Civil Suit only when the entity itself is [an] moving force behind the held deprivation thus in [an] official-capacity suit the entity(s) policy "or" custom must have played a part in the violation of federal law as see → T.C.A. § 41-1-103 oath of office was the moving force that clause clear deprivation done by its(s) supervisory liability theory only because the former: Commissioner Mr. Tony Parker, understated warden: Mr. Mike Darris

IV. Statement of Claim 10 of 18.

Morgan County State Prison Correction Officer(s) was personally involved or acquiesced in any unconstitutional conduct as Plaintiff aver His Claim(s) Thus falls against above held Defendant : Tony Parker, for each allowed illegal action(s) out line under Supervisory Liability See ex parte young Teaches That When a State Officer acts under a state law in a manner violative of The federal Constitution, He (or) she comes into conflict with The Superior authority of That Constitution & He (or) she is in That case (stripped) of his said official (or) representative character & is subjected in his person to The consequence of his [individual] conduct. Thus Plaintiff claim(s) Deprivation which can be held liable for Damage(s) where The failure to Supervise due amount(s) to → (Deliberate Indifference) to The rights of persons incarcerated guiding This said Determination is The Supreme Court's recent decision in City of Canton v. Harris, 489 U.S. 378. 109. S. Ct. 1197, 103. L. Ed. 2d. 414. 6 T. (1989). liability only were The failure to Train amount(s) to ground(s) (Deliberate Indifference) to The rights(s) of persons with whom The police came into contact. as were comes primary authority at →

IV. Statement of claim 11 of 18;

fed. R. of. civil p., § any claims for relief MUST contain allegations that show that the Plaintiff: Mr. Adrian K. Madin JR., was deprived of right(s) guaranteed by the Constitution of the Law(s) of the United States, Thus to state a valid claim for relief that is plausible on its face "an" complaint must contains sufficient factual matter(s) as accepted as true → Heinrich v. waiting angels adoption services, inc., 668.f.3d.3993, 403 (6th Cir. 2012) 3. ingomex v. u.s. ex. fed sav. bank, 171.f.3d.794. 795-96 (2nd Cir. 1999). The above Plaintiff avers(s) holding that dismissal of a pro se complaint under § 1915(e)(2)(B) should be done with leave to amend unless the court can rule out any possibility however unlikely it might be that the amended complaint would succeed in stating a claim up on its face → Lopez v. Smith, 203 f.3d. 1122, 1124. (9th Cir. 2000). (en banc) (same) See, Bazowx v. Scott 136.f.3d.1054. (5th Cir. 1998) holding under 42 U.S.C. § 1997(e) (c) that the dismissing a pro se complaint contains a potentially cognizable claim as → plaintiff should be allow to particularize the claim. Thus therefore Plaintiff avers furthermore, Federal rule(s) of civil procedure 8(a)(2) requires only a short & plain statement of the claim showing

IV. Statement of Claim 12 of 18,

That The pleader is entitled "To relief".

Specific facts are not necessary.

The statement need only give the defendant(s) fair notice of what the claim is & the legal ground(s) upon which it rests. ^{at} Id. 2200 (quoting under Twombly 127, S.C.T. of 526 f. 3d. 291, 1964).

AS Come(s) The prose plaintiff: Mr. Adrian Madin Jr. seeks to make entry of his infliction of unnecessary pain & suffering along with the inflicted use of force amount(s) to the unnecessary & wanton infliction of pain a plaintiff. See k(s) \$250,000.00 dollar(s) against defendant: Ms. Kaylyn Coffey, for the pain & suffering abuse of \$250,000.00 dollar(s) against the above defendant for mental distress abuse of \$250,000.00 dollar(s), against the above defendant for physical & mental danger abuse of \$250,000.00 dollar(s) against the above defendant for emotional distress + mental anguish as the full total for conduct by the held said defendant: Ms. Kaylyn Coffey, abuse under color of state law by depriving plaintiff of his civil rights. Apply(s) \$1000,000.00 dollar(s) as plaintiff seek(s) \$250,000.00 dollar(s) against defendant: Derrick Daughtry, for the held

IV. Statement of Claim 13 of 18

Pain & suffering abuse & \$250,000⁰⁰ dollar(s) against
Mental distress abuse.

3, \$250,000⁰⁰ dollar(s) for physical & mental damage
abuse. 3 \$250,000⁰⁰ dollar(s) for emotional distress
+ mental anguish; as The full conduct By The said
Defendant : Mr. Derrick Doughtery, abuse under color
of state law By depriving plaintiff of His Civil
rights. Total amount \$1,000.00⁰⁰ dollar(s)
along with prose-plaintiff : Mr. Adrien Kenton. Madin Jr.
Seeks \$250,000⁰⁰ dollar(s) against both of The
Defendant(s) C/o: Ms. Kaylyn Coffey, & Co-party
Staff : Mr. Derrick Doughtery, for The
Violation of Tennessee, law under The said
T.C.A. § 41-1-103 officers & employees, oaths &
affirmations. Thus Due To area (C) The
Violation of This oath by any of The officers or
employees Shall be perjury punishable as in other
Cases of perjury.

Therefore each Warden / Mr. Mike Parris, & his
Under Staff / Mr. Steve Jones, along with
Mr. Stacy Oake(s) ; If are held against
The Said \$250,000⁰⁰ dollar(s) each
for The Clause of Under Staff Violation
of The Tennessee law at TCA § 41-1-103 (7)
(A) Which was deprived by deprivation at

I V. Statement of claim 14 of 18

Plaintiff seek(s) \$250,000.⁰⁰ dollar(s) from each field Said Warden(s) for The Violation(s) of Tennessee Law at Said T.C.A. § 41-1-104 et Warden, powers & duties, were area (b) was never Applied before "or" after The fact of The understaff C/o(s) use - of - force Abuse which was done out of (Malicious intent). That clause The first amendment-protected interest Violation's could itself constitute compensable injury wholly apart from any → emotional distress, humiliation & personal indignity, emotional pain, embarrassment, fear, anxiety, & anguish suffered. By The Said Prose-plaintiff: Mr. Adrian Kenton. Madin Jr., Thus Consequently The basic purpose of § 1983 damages is To compensate person for injuries that are caused by the deprivation of Constitutional rights as review → Carey v. Piphus; 435 U.S. at, 254, 98 S.Ct. at 1047; (Emphasis added) See id; 257, 98 S.Ct. at 1049 (damages awards under) § 1983 should be governed by The principle of Compensation.

as come The above Said Plaintiff seek(s) 250,000 dollar(s) against each Warden(s) for The Said Supervisory Liability Thus for its breach of duty(s) Because of one(s) Held Said physical injury(s) & or To one(s) Health.

→

IV. Statement of Claim 15 (Op) 18.

See at / Memphis Community School dist v. Stachura.
477 U.S. 299. 106. S. Ct. 2537. 91. L. Ed. 2d. 249.

(1986)) Plaintiff Aver(s) Accordingly when 1989 Plaintiff
Who seek damages for violation(s) of any kind
of Constitution right(s). The Level of damages
is ordinarily determined according to principles
derived from The Common Law of Torts. Thus
Therefore The full amount should stand \$ 750,000.00
dollar(s) against The Warden(s) MUST Be Said
To uphold That amount. → because of There held
of it(s) held Said UnderStaff C/o Ms. Kaylyn Coffey
3 Her Co-party Staff Mr. Derrick DoughThe, Main
Environment which has clause suffered made by
Retaliatory action(s) done of prison officials.
See at / Lafountain v. Harry United States Court of

Appeal(s). Sixth Circuit May 22, 2013. 716. F.3d.
944. 85. fed. R. Ser. 3d. 1166.

Therefore Plaintiff seek(s) \$ 1,000,000.00 dollar(s)
against T doc / Commissioner: Ms. Lisa Heston •
due To Supervisor liability *

Were Her UnderStaff Warden(s) Un'Constitutional
behavior of alleged Deprivation can be held
Liable for Damages Where The failure
To Supervise amount(s) To down right
[Deliberate indifference] To The right(s)
of a persons incarcerated at The →

IV. Statement of Claim 16 ~~of~~ 18

Tennessee Department of Correction(s). This determination is The Supreme Court(s) recent decision in City of Canton v. Harris, 489 U.S. 378. 109 S.Ct. 1197. 103 L.Ed. 2d. 412. (1989) in Canton. The city appealed a Sixth Circuit decision which held that a municipality could be liable for failing adequately to train its staff police force where the municipality recklessly intentionally, (or) with gross negligence failed to train its officers under circumstances in which a deprivation of constitutional rights was substantially certain to result.

As under Tennessee law at T.C.A. § 4-3-603 Commissioner(s) duties: Ms. Lisa Helton Her understaff wardens at Monroe County State Prison lower level Clos abuse was said actionable by deprivation(s) that was clause by the based on misuse of power possessed by virtue of STATE LAW 3 made possible only because the wrongdoer(s) is clothed with the authority of state law. / As the Tennessee law at T.C.A. § 4-3-606 power 3 duties has been unlawfully blind its duty to provide fair training to uphold its duty 3 such training which should ensure plaintiff his safety against deprivation Romiko →

IV. Statement of Claim 17 of 18,

See Hutto v. finney, 437 U.S. 678. 98.S.Ct. at 2565, 57.L.Ed.2d. 522 (1978)) if it is Cruel & unusual punishment To #316 hold Convicted Criminals in unsafe conditions.

it must be unconstitutional To confine The involuntarily committed -- who may not be punished at all -- in unsafe conditions.

as This clause [an] Eighth Amendment error(s) Made Against [Deliberate indifference] As Prose - plaintiff : Mr. Adrian K. Madin Jr., After (S) The Tennessee department of Correction short for (T.D.O.C) are under T.C.A § 8-8-303.

Waiver of governmental immunity, appointed special deputies Special Volunteer & reserve sheriffs deputies : Because at area(b) The plaintiff shall be required To such special deputy + whether The special deputy is acting within The scope of employers "or" not.

Such immunity from suit shall not apply in The case of special volunteer "or" said reserve sheriffs deputies while performing official law enforcement duties under supervision "or" direction of The Sheriff.

As Under → 28 U.S.C. A. § 1343 Civil rights & elective franchises at area(A) The district courts shall have original jurisdiction of any civil action authorized by law to be commenced by any person. Were all defendant(s) in This Civil Suit are under The 1979 ACTs. Section 3 of sub 6. 96 170 provide

IV. Statement of Claim 18 of 18.

[Amending This Section § Section 1983 of Title 42,
The public Health & Welfare.]

Shall apply with respect To any deprivation of
rights, privileges, "or" immunities secured by The
Said Constitution & Laws occurring after The date
of The enactment of This act (Dec. 29. 1979) Therefore
The Defendant(s) refused & ignoring The Said
imminent risk Caused To prose-plaintiff Mr. madin Jr
By use of force which Clause Assault By
unlawful attack(s) of C/o ms. kaylyn Coffery ;¹³

Co party Staff: mr. Derrick daughterly were The face
of This Civil Suit Complaint Validate deprivation
Under Color of State Law as Morang County State
prison officials Have deprived away from its
own T.C.A. § 41-1-103 area (A) Made Count 'less
Violation(s) against The oath of office under.

officers & employees, oaths & affirmations(s) at
(C) The Violation of This oath by any of The officers
"or" employees shall be perjury & punishable as in other
Case(s) of perjury .

Thus The full giving amount \$ 6,000.000 ^{as} million dollars
Dollar(s) Should stand Under The review of This
U.S. district Court of Knoxville, Tennessee as prose
plaintiff has state a Claim for relief upon its face
as Defendant(s) are To answer under Rule 8 at area
(B) Detainees, Admissions & Denials. (end.)

V RELIEF 10 of 3 .1

(State BRIEFLY exactly what you want this Court to do for you. Make NO legal arguments.
Cite NO cases or statutes.)

(A) → Plaintiff Seek(s) His right under 7Th Amendment
relief To a jury Trial because my self pose
Mr. Adrian Kenton Madin JR., Submitted
enough factual matter(s) To Support (any) 8th Amendment
Violation(s) Use of force abuse under color of STATE LA

SIGNED THIS 08th DAY OF August, 2022.

x Mr. Adrian K. Madin JR. :)
SIGNATURE OF PLAINTIFF

V. Relief 2 of 3,

(B) Plaintiff seek(s) The defendant: mrs. Lisa Helton which is The Head T.d.o.C Commissioner upholds Her Tdoc policy index # 305.01 Employee disciplinary action(s) .

Under I V. Definition (A) appointing Authority were Marong County Main Warden Defendant: Mr. Mike Parris, du Apply unsatisfactory Conduct against His held Under Staff C/o(s) Defendant(s): Ms. Kaylyn Coffey & Co party Mr. Derrick Dougherty, & all unknown Officer(s) on Viconnet Video System Day of The Said September 29, 2021 .

all Be held against area(s) dismissal(s) The termination of an employee from His/Her position for disciplinary reason's .

as The Law of The Land Stand(s) By Plaintiff Relief Stand(s) under T.C.A. § 8-30-316 . The notice of termination must outline reasons for the dismissal & explain how the good of its service is served by the action .

V. Relief 3 (of 3),

Thus prose / plaintiff Mr. Adrian K. Madin JR.,
Seek(s) That all defendant(s) are To Be
Held against The Tennessee Law within said
T.C. A § 8-8-302 Suits against County
anyone incurring any wrong, injury, loss damage •
or expense resulting from any act (or) failure To
act expense resulting from any act clause
on The part of any deputy appointed By The Sheriff
May bring Suit against The County in which The
Sheriff serves, provided, That The deputy is
at The time of such occurrence ! as its clear

[Acting by Virtue of or under Color of The office
as all defendant(s) are under Individual capacity
under This Civil Suit § 1983 Complaint as by law
under Administrative policies & procedures state
of Tennessee department of Correction index # 105
at area V Policy → (TDOC employees who are
sued or subpoenaed in Their professional
Capacity Shall receive Service of process &
Notification of The Suit or Subpoena.)

- Sworn Affidavit -

Plaintiff request Max \$ 6,000.000 ^{ee} dollar(s) if This lawsuit goes before a jury Trial 3 Plaintiff is giving all fairness throughout out jury Trial Verdict goes in his Be half (or) if all defendants can come together within "A" fair SETTLEMENT deal agreement between max Cap request above as in order to keep The Civil Complaint suit from going to trial before jury of (6) member(s) due emotional distress 3 suffering abuse.) 3 The Eighth Amendment use of force under color of STATE LAW abuse.) 3 Mental distress abuse 3 Cruel 3 unusual punishment abuse.) 3 physical 3 mental danger.) 3 deliberate indifference 3 abuse.) 3 Supervisor liability Violation(s) which + Clause failure of duties To provide such training to ensure safety under the Tennessee Law I.C.A. § 41-1-103 oath 3 employees ; oath 3 affirmation(s) 3 Violation against I.C.A. § 41-1-104 warden, powers 3 duties x Administrator .

Pro'se- Plaintiff, Date 1 / 30 / 2022 ,

x John R. GRUBBS
Notary Public Sworn to 3 Subscribed Before Me
This 31st day of July 2022 .
My Commission expires on 10 / 22 / 22 .

— Sworn Affidavit —

Plaintiff x Mr. Adrian Madin JR. State under oath he would like this court to due hand pick the Civil Suit jury trial of said start of 12 3 droped down to just (6) member(s) from the Knoxville, TN 3 said Chattanooga TN District area(s) as no jurors can be apart of this jury trial if he (or) she have any kind of family member(s).

That has ever worked for the jail system County(s) under the state of Tennessee (or) the Tennessee Department of Correction(s) as public of ficals (or) staff member(s) "or" any higher level state paid job(s) within the state of Tennessee.

as the jury member(s) will be of both color(s) white(s) black plaintiff state(s) its never about the race card within this lawsuit but right from wrong & the unlawful deprivation & held disrespecT under oath of color of state law abuse from each said defendant(s) that disown'd the above plaintiff right(s).

Plaintiff x Adrian Madin JR, Date 7/30/2022.

Notary → x [Signature] sworn to & subscribed to before me this 30th day of July 20²².

my Commission expires on 1/22/22.